

Federal Defenders OF NEW YORK, INC.

Southern District
52 Duane Street- 10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

Leonard F. Joy
Executive Director

Southern District of New York
John J. Byrnes
Attorney-in-Charge

December 10, 2007

By Fax and Hand Deliver

Honorable Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. William Ruiz
 07 Cr. 917 (LAP)**

Dear Judge Preska:

On behalf of my client, William Ruiz, I write to request a thirty day adjournment of the upcoming control date in the above-captioned case, currently scheduled for Thursday, December 13, 2007. I am on trial before the Honorable Allynne Ross in the Eastern District of New York and need a thirty day extension on the above indictment. Assistant United States Attorney Mark Lanpher consents to this request on behalf of the Government.

To that end, if the Court grants the request for an adjournment, we further request that the time between the December 13, 2007 the next date for a status conference be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161(h)(8)(A). Excluding time will best serve the ends of justice and outweigh the best interest of the public and the defendant in a speedy trial, because it will allow for plea negotiations to successfully culminate in a guilty plea. Thank you.

Respectfully submitted,

Sabrina P. Shroff
Assistant Federal Defender
212-417-8713

cc: Assistant United States Attorney Mark Lanpher, via facsimile